

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

DOYLE LEE HAMM,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.
)	2:17-cv-02083-KOB
JEFFERSON S. DUNN, Commissioner,)	
Alabama Department of Corrections,)	
et al.,)	
)	
Defendants.)	

DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL

Come now the Defendants, the Commissioner of the Alabama Department of Corrections, et al. (hereinafter “the State”), through the Alabama Attorney General’s Office, and hereby move the Court for leave to file a response to this Court’s order of May 30, 2018 (Doc. 124), under seal. As grounds, the State provides as follows:

1. The order states in relevant part, “If Defendants seek to redact any other information contained in the protocol, they may file, under seal, a motion to redact that other information, which the court will review before releasing the protocol.” (Doc. 124 at 2.)

2. The State seeks to make certain redactions outside the scope of the order and desires to set forth these proposed redactions in a motion under seal.

3. The State also seeks to propose redactions to documents 53, 54, and 71, which are currently under seal, in accordance with the order of May 30, 2018.

Wherefore, for the premises considered, Defendants request that this Court permit the State to file a motion under seal pursuant to the order of May 30, 2018.

Respectfully submitted,

Steve Marshall
Alabama Attorney General

s/ Beth Jackson Hughes
Beth Jackson Hughes
Alabama Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2019, I served the above motion by e-mail to the following:

Bernard Harcourt and John Palombi
Counsel for Plaintiff Doyle Lee Hamm

John G. Thompson, David A. Schulz, and John Langford
Counsel for Intervenor Plaintiffs

s/ Beth Jackson Hughes
Beth Jackson Hughes
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